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Our File No.: 0000352152

July 13, 2011

Electronically Filed

Hon. Rya W. Zobel
United States District Court
for the District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way
Boston, Massachusetts 02210

Re: *Skyhook Wireless, Inc. v. Google Inc.*,
Case No. 1:10-cv-11571-RWZ (D. Mass.)

Dear Judge Zobel:

I write to advise the Court of defendant and counterclaim-plaintiff Google Inc.'s position with respect to the relief requested by plaintiff and counterclaim-defendant Skyhook Wireless Inc. in its letter to the Court of Friday, July 8, 2011. Although not styled as a motion, Skyhook's letter asks the Court to enter, on an interim basis, the protective order proposed by Google in its pending Motion For Entry of a Protective Order and accompanying Memorandum of Law, and attached as Exhibit A thereto. *See* Dkt. Nos. 29 and 30. Skyhook further requests that the entry at this time of Google's proposed protective order not be viewed as prejudicial to the resolution of Google's Motion or Skyhook's own pending Motion For Entry of a Protective Order. *See* Dkt. Nos. 31-33.

Google is amenable to entry of its proposed protective order, whether on either an interim basis prior to the Court's resolution of the pending cross-motions, or on a permanent basis for the reasons set forth Google's pending Motion and the accompanying memoranda. Google recognizes and agrees that should the Court prefer to enter Google's proposed protective order while it further considers the appropriate scope of a patent prosecution bar (which is the single disputed issue presented in the pending-cross motions), this would not prejudice the Court's consideration of that issue.

For the sake of the record, I must note that, notwithstanding any contrary suggestion, Google has produced voluminous confidential documents to Skyhook that are available for use in this action. *See* Exhibit C to Ms. Somait's July 8 letter (noting production of over 128,000 pages of documents in the related state case, including highly confidential documents, which the parties have agreed are deemed produced in this action).

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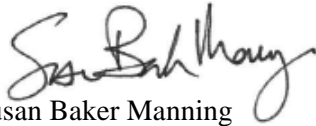
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I am, of course, available at Your Honor's convenience should the Court require any further information or assistance with regard to this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Susan Baker Manning". The signature is fluid and cursive, with the first name "Susan" being more prominent.

Susan Baker Manning

cc: Lina F. Somait, Esq., counsel for Skyhook Wireless, Inc.

CERTIFICATE OF SERVICE

I, Susan Baker Manning, hereby certify that this document filed through the EFC system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on July 13, 2011.

/s/ Susan Baker Manning
Susan Baker Manning